

Synopsis of Public Comments Submitted at the C-DAC Meeting
By Thomas A. Broderick
Executive Director
Construction Safety Council
January 6, 2004

- Create a user and OSHA Compliance Officer friendly standard in plain English
- Consider drafting a standard using the “best practice” approach first, then make adjustments, if necessary, for unique situations, economic impact, etc. Remember that the SBREFA process will give “Mom and Pop” shops a final bite at the apple in terms of economic constraints on small businesses.
- Try to make the standard as instructive as possible regarding the popular myth that overhead power lines are insulated. Most are bare conductors. Those with a plastic coating are almost always covered for protection from the elements, bird droppings, etc., and provide no insulation.
- Clearly define roles and responsibilities for controlling contractors, owners and utility companies, as appropriate.
- Clearly define the role and responsibilities for the competent person for work in close proximity to power lines. Where possible, the competent person should be involved in the meeting with utility company representatives and project management.
- Require a permit system similar to that used in confined space or hot work applications. The permit would require a preliminary survey of the site for the presence of power lines. It would identify the equipment with the potential to reach/enter an “affected zone” where contacts could occur and provide a list of choices that the competent person could check off to itemize the intervention steps to be implemented (e.g.: proximity warning devices, insulated links, physical barricades, insulation for the lines installed by a qualified person, etc.
- Include emergency response provisions; what to do in case of contact, access to communications to contact EMS and to report to utility, availability of CPR and first aid trained personnel, caution that lines will be considered energized and rescuers maintain a safe distance from workers that remain in contact with power line until qualified person determines that lines are deenergized and grounded.
- C-DAC should strongly recommend that OSHA work with industry and utility companies to develop and facilitate hands-on training opportunities for OSHA Compliance Officers, similar to the successful model that followed the promulgation of Subpart R – Steel Erection.

- C-DAC should recommend that OSHA develop an outreach training effort to reach the affected parties in the private sector, such as contractors, labor unions, utilities, etc. Since there is time between the approval of the final draft of the regulatory text and the effective date of the standard, the Office of Training and Education should be given the charge to develop training materials and programs prior to the onset of enforcement activities.